

Stevens & Lee

425 Biden Street, Suite 300
Scranton, PA 18503
(570) 343-1827
www.stevenslee.com

T: (570) 969-5360
F: (610) 371-7360
thomas.vanaskie@stevenslee.com

May 14, 2024

Hon. Marie Renée Bumb
Chief Judge, United States
District Court, District of New Jersey
4th & Cooper Streets Room 1050
Camden, NJ 08101

Re: In re Valsartan, Losartan and Irbesartan Products Liability Litigation, MDL No. 19-2875 (RMB)

Dear Chief Judge Bumb,

As you may know, I have been serving pursuant to Fed. R. Civ. P. 53 as a court-appointed Special Master to handle discovery and discovery-related matters in the above-referenced matter. A copy of the appointment order (ECF Doc. No. 692), entered on December 22, 2020, accompanies this letter.

On May 10, 2024, I issued Special Master Order No. 98 (ECF Doc. No. 2712), granting in part and denying in part Plaintiffs' second Motion for Sanctions (ECF Doc. No. 1838). For your convenience, I have attached a copy of Special Master Order No. 98 to this letter. The Order, among other things, requires the parties to address (a) the language of an instruction drawing an adverse inference against Zhejiang Huahai Pharmaceutical Co, Ltd. ("ZHP") and (b) the amount of money (if any) to award for ZHP's violations of court orders that required production of certain documents and its CEO to be deposed.

I am available to discuss these and other matters relating to this litigation at your convenience. (The appointment order provides that "the Special Master may consult with the Court as needed. . . .") I am also available to attend any conferences that you schedule. I look forward to the opportunity to meet you.

Sincerely,

s/ Thomas I. Vanaskie
Thomas I. Vanaskie

Cc: ECF Docket